

Remarks

Reconsideration of this application as amended is respectfully requested.

Claims 1-8 stand rejected under 35 U.S.C. §102(e) as being unpatentable over U.S. Patent No. 6,356,665 of *Lei et al.* ("*Lei*").

Claims 1-8 have been cancelled. New claims 9-28 have been added.

Applicant respectfully submits that new claim 9 is not anticipated by *Lei*. New claim 9 is a method for coding a set of numbers represented by a set of bit-planes that includes the limitations

generating a bit stream that describes a current one of the bit-planes in terms of a tree structure having a hierarchical arrangement of leaves such that the leaves of the tree structure are described in the bit stream in an order that is determined by an arrangement of zero values in a tree structure for the bit-plane having a next higher significance.

(New claim 9) (emphasis added).

Lei does not disclose that leaves of a tree structure for a current bit-plane are described in an order that is determined by an arrangement of zero values in a tree structure for the next higher bit-plane as claimed in new claim 9. Instead, *Lei* teaches that a quad-tree scan order is an arbitrary convention. (*Lei*, col. 4, lines 52-55). In further contrast, *Lei* discloses a Z scan order which proceeds from top left to bottom right of a bit-plane regardless of the arrangement of zero values in the next higher tree structure. (*Lei*, col. 4, lines 56-65). Figures 6A and 6B of *Lei* show bit streams produced by Z scanning of a set of bit-planes 94-100. For example, *Lei* teaches a Z scan order for describing the bit-plane 96 regardless of the arrangement of zero values in the bit plane 94 and teaches a Z scan order for describing the bit-plane 98 regardless of the arrangement of zero values in the bit plane 96, etc.

Given that new claims 10-16 depend from new claim 9, it

is submitted that new claims 10-16 are not anticipated by *Lei*.

It is also submitted that new claims 17 and 24 are not anticipated by *Lei*. New claims 17 and 24 include limitations similar to the limitations of new claim 9. Therefore, the remarks stated above with respect to new claim 9 also apply to new claims 17 and 24.

Given that new claims 18-23 and 25-28 depend from new claims 17 and 24, respectively, it is submitted that new claims 18-23 and 25-28 are not anticipated by *Lei*.

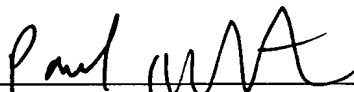
It is respectfully submitted that in view of the amendments and arguments set forth above, the applicable rejections have been overcome.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 08-2025 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: 8-20-03

By: _____



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